

BEYS LISTON MOBARGHA & BERLAND LLP
Michael P. Beys

October 20, 2016

VIA ECF & FACSIMILE (212-805-7986)

The Honorable Paul G. Gardephe
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: Oct-28, 2016

Re: *United States v. Kaleil Isaza Tuzman*, No. S7 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We are counsel to defendant Kaleil Isaza Tuzman, who is currently on home detention with travel restricted to the Southern District of New York. We respectfully submit this letter, with the agreement of the government, to obtain the defendant's Colombian national ID/social security card, known as a "Cédula," which the defendant surrendered under the terms of his pretrial release from custody (ECF 69). The defendant's Cédula is currently in the possession of his Pretrial Services Officer John Moscato.

Although the parties disagree as to whether a Cédula can today be used for travel – the government and Court already possess the defendant's passports – the defendant needs to use his Cédula for reasons other than travel. The defendant needs to use his physical Cédula for a variety of legal and business matters handled at the Colombian Consulate in New York, including powers of attorney related to his legal defense, notarization of legal and business documents, and the like.

The parties have agreed that, subject to the Court's approval, Pretrial Services will release the defendant's Cédula to the defendant's attorneys. The Cédula will remain at all times in the defendant's attorneys' custody and control and will be used exclusively for business and legal purposes. At no time will the defendant be permitted to possess the Cédula and at no time will the Cédula be used in connection with domestic or international travel.

Accordingly, we respectfully ask, on consent of the government, for a modification of the defendant's bail to allow the release of defendant's Cédula, according to the terms of the parties' agreement as stated above.

825 Third Avenue, 2nd Floor, New York, NY 10022
Main: 646.755.3600 • Fax: 646.755.3599
www.blmblaw.com

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We thank the Court in advance for its consideration.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Esq.
Counsel for Kaleil Isaza Tuzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via email)